STOLL KEENON & PARK LLP

300 WEST VINE STREET | SUITE 2100 | LEXINGTON, KENTUCKY 40507-1801 (859) 231-3000 PHONE | (859) 253-1093 FAX | WWW.SKP.COM

LINDSEY W. INGRAM, JR. 859-231-3033 ingramjr@skp.com

July 3, 2003



Via Hand Delivery

Mr. Thomas Dorman Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

RE: Case No. 2003-00143

Dear Tom:

I deliver herewith the original and three copies of a Petition to Intervene on behalf of Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative Corporation, Inc.; Peoples Rural Telephone Cooperative Corporation, Inc.; South Central Rural Telephone Cooperative Corporation, Inc. and the Independent Telephone Group for filing.

Very truly yours,

STOLL, KEENON & PARK, LLP

By Condsey Ingram, Jr.

/sl Enc.

cc: Counsel of Record

312\C:\Work\LWI\ITG\2003-00143\002 Dorman.doc

LEXINGTON | LOUISVILLE | FRANKFORT | HENDERSON

RECEIVED JUL 0 3 2003 PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PETITION OF NPCR, INC.,)	
D/B/A NEXTEL PARTNERS FOR)	CASE NO. 2003-00143
DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER IN)	
THE COMMONWEALTH OF KENTUCKY)	

IN THE MATTER OF:

PETITION TO INTERVENE ON BEHALF OF LOGAN TELEPHONE
COOPERATIVE, INC.; MOUNTAIN RURAL TELEPHONE COOPERATIVE
CORPORATION, INC.; PEOPLES RURAL TELEPHONE COOPERATIVE
CORPORATION, INC.; SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE
CORPORATION, INC. AND THE INDEPENDENT TELEPHONE GROUP

Come Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative Corporation, Inc.; Peoples Rural Telephone Cooperative Corporation, Inc.; South Central Rural Telephone Cooperative Corporation, Inc. and the Independent Telephone Group, by counsel, and for their request for full intervention herein state as follows:

1. Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative Corporation, Inc.; Peoples Rural Telephone Cooperative Corporation, Inc. and South Central Rural Telephone Cooperative Corporation, Inc. are rural, incumbent Local Exchange Carriers providing telecommunications services in areas of the Commonwealth of Kentucky wherein the Petitioner herein seeks designation as an Eligible Telecommunications Carrier.

An association of rural telephone companies consisting of Ballard Rural Telephone Cooperative Corporation, Inc.; Brandenburg Telephone Company; Coalfields Telephone Company; Duo County Telephone Cooperative Corporation, Inc.; Foothills Rural Telephone Cooperative Corporation, Inc.; Highland Telephone Cooperative, Inc.; Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative Corporation, Inc.; North Central Cooperative Corporation; Peoples Rural Telephone Cooperative Corporation, Inc.; South Central Rural Telephone Cooperative Corporation, Inc.; Thacker-Grigsby Telephone Company, Incorporated and West Kentucky Rural Telephone Cooperative Corporation, Inc.

2. The Independent Telephone Group is a group of independent, rural, incumbent

Local Exchange Carriers providing telecommunications services in rural areas of the

Commonwealth of Kentucky. Four of its members provide service wherein the Petitioner seeks

to be designated as an Eligible Telecommunications Carrier.

Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative

Corporation, Inc.; Peoples Rural Telephone Cooperative Corporation, Inc. and South Central

Rural Telephone Cooperative Corporation, Inc. have a direct interest in the determination of

Eligible Telecommunications Carriers in areas served by them and the Independent Telephone

Group has an interest in the public policy decisions involved in the requests for Eligible

Telecommunications Carriers status in rural areas of the Commonwealth of Kentucky because its

members are incumbent Local Exchange Carriers in rural areas of Kentucky.

4. Applicants are likely to present issues and develop facts that will assist the

Commission in considering the request of the Petitioner without unduly complicating or

disrupting the proceeding.

3.

WHEREFORE. Applicants pray that they be granted full intervention herein, that they

be afforded an opportunity for discovery and all other relief to which they may appear entitled.

STOLL, KEENON & PARK, LLP

300 West Vine Street, Suite 2100 Lexington, Kentucky 40507-1801

Telephone: (859) 231-3000

BY: Lindsey Ingram, Jr.

ATTORNEYS FOR APPLICANTS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Petition has been served by mailing same, postage prepaid, on this 3rd day of July, 2003, to the following:

David A. Pike, Esq.
Timothy R. Pickrel, Esq.
Stephen C. Lentz, Esq.
F. Keith Brown, Esq.
Pike Legal Group, PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, Kentucky 40165-0369

Albert J. Catalano, Esq. Catalano & Plache PLLC 3221 M Street, NW Washington, D.C. 20007

Elizabeth Schofield Brown, Esq. Nextel Partners, Inc. 13405 Eastpoint Centre Drive, Ste. 100 Anchorage, Kentucky 40223

Donald J. Manning, Esq. Vice President & General Counsel NPCR, Inc. dba Nextel Partners 4500 Carillon Point Kirkland, Washington 98033

Ronald J. Jarvis, Esq. Catalana & Plache, PLLC 3221 M Street, N.W. Washington, D.C. 20007

STOLL, KEENON & PARK, LLP

By Linds bryum J. Lindsey W. Ingram, Jr.